

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	
	:	CONSENT PRELIMINARY ORDER
- v. -	:	OF FORFEITURE/
	:	<u>MONEY JUDGMENT</u>
ALVARO GEOVANNI QUIJADA-LEMUS,	:	
	:	24 Cr. 599 (JPO)
Defendant.	:	
-----	x	

WHEREAS, on or about October 15, 2024, ALVARO GEOVANNI QUIJADA-LEMUS (the “Defendant”), among others, was charged in three counts of a six-count Indictment, 24 Cr. 599 (JPO) (the “Indictment”), with conspiracy to commit money laundering, in violation of Title 18, United States Code, Section 1956(h) (Count Four); money laundering, in violation of Title 18, United States Code, Sections 1956(a)(3)(B)(i) and 2 (Count Five); and operation of an unlicensed money transmitting business, in violation of Title 18, United States Code, Sections 1960 and 2 (Count Six);

WHEREAS, the Indictment included a forfeiture allegation as to Counts Four through Six of the Indictment, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), of any and all property, real and personal, involved in the offense charged in Counts Four through Six of the Indictment, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in the offense charged in Counts Four through Six of the Indictment;

WHEREAS, on or about \_\_\_\_\_, the Defendant pled guilty to Count Four of the Indictment, pursuant to a plea agreement with the Government, wherein the Defendant admitted the forfeiture allegation with respect to Count Four of the Indictment and agreed to forfeit

to the United States, a sum of money equal to \$264,051.66 in United States currency, representing property involved in the commission of the offense charged in Count Four of the Indictment;

WHEREAS, the Defendant consents to the entry of a money judgment in the amount of \$264,051.66 in United States currency, representing the property involved in the offense charged in Count Four of the Indictment; and

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the Defendant, the property involved in the offense charged in Count Four of the Indictment cannot be located upon the exercise of due diligence.

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Jay Clayton, United States Attorney, Assistant United States Attorneys Cecilia Vogel, Christopher Brumwell, and Vladislav Vainberg, of counsel, and the Defendant and his counsel, Benjamin Zeman, Esq., that:

1. As a result of the offense charged in Count Four of the Indictment, to which the Defendant pled guilty, a money judgment in the amount of \$264,051.66 in United States currency (the "Money Judgment"), representing the amount of property involved in the offense charged in Count Four of the Indictment, shall be entered against the Defendant.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the Defendant ALVARO GEOVANNI QUIJADA-LEMUS, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

3. All payments on the outstanding money judgment shall be made by postal money order, bank or certified check, made payable, in this instance, to the United States Marshals Service, and delivered by mail to the United States Attorney's Office, Southern District of New

York, Attn: Illicit Finance and Money Laundering Unit, 26 Federal Plaza, 38<sup>th</sup> Floor, New York, New York 10278 and shall indicate the Defendant's name and case number.

4. The United States Marshals Service is authorized to deposit the payments on the Money Judgment into the Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. Pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.

6. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

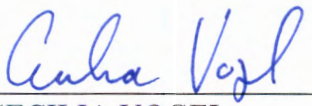
7. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

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8. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

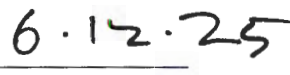
JAY CLAYTON  
United States Attorney for the  
Southern District of New York

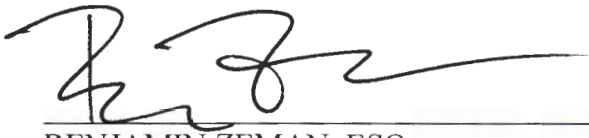
By:   
\_\_\_\_\_  
CECILIA VOGEL  
CHRISTOPHER BRUMWELL  
VLADISLAV VAINBERG  
Assistant United States Attorneys  
26 Federal Plaza  
New York, NY 10278  
(212) 637-2477/1029/1084

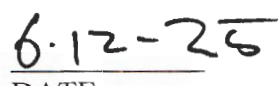
  
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ALVARO GEOVANNI QUIJADA-LEMUS

By:   
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ALVARO GEOVANNI QUIJADA-LEMUS

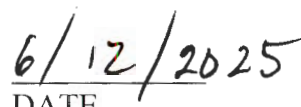
  
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By:   
\_\_\_\_\_  
BENJAMIN ZEMAN, ESQ.  
Attorney for Defendant  
20 Vesey Street, Suite 400  
New York, New York 10007

  
\_\_\_\_\_  
DATE

SO ORDERED:

  
\_\_\_\_\_  
HONORABLE J. PAUL OETKEN  
UNITED STATES DISTRICT JUDGE

  
\_\_\_\_\_  
DATE